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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	Case No.
)	
Plaintiff,)	<u>COUNT 1:</u>
)	CONSPIRACY TO DISTRIBUTE
v.)	METHAMPHETAMINE
)	Vio. 21 U.S.C. §§ 846,
JASON GERALD WOODS,)	841(a)(1) and (b)(1)(B)
BOAPHAN SENGCHAREUN a/k/a)	
“Kun,” and MICHAEL DEAN)	<u>COUNTS 2-11, 13:</u>
MILLER)	DISTRIBUTION OF A
)	CONTROLLED SUBSTANCE
Defendants.)	Vio. of 21 U.S.C. § 841(a)(1) and
)	(b)(1)(B), (C)

) COUNT 12:
) POSSESSION WITH INTENT TO
) DISTRIBUTE A CONTROLLED
) SUBSTANCE
) Vio. 21, U.S.C. §§ 841(a)(1) and
) (b)(1)(B)
)
) COUNT 14-15:
) USING OR CARRYING A
) FIREARM DURING AND IN
) RELATION TO THE
) COMMISSION OF A DRUG
) TRAFFICKING CRIME
) Vio. 18 U.S.C. § 924(c)(1)(A)(i)
)
) COUNT 16:
) FELON IN POSSESSION OF A
) FIREARM
) Vio. 18 U.S.C. §§ 922(g)(1) &
) 924(a)(2)
)
) CRIMINAL FORFEITURE
) ALLEGATION NO. 1:
) Vio. 21 U.S.C. § 853(a)(1), (a)(2)

INDICTMENT

The Grand Jury charges that:

COUNT 1:

CONSPIRACY TO DISTRIBUTE METHAMPHETAMINE

Beginning at a date uncertain, but by at least on or about April 26, 2012, and continuing until at least on or about October 3, 2012, both dates being approximate and inclusive, in the District of Alaska, defendants

JASON GERALD WOODS, BOAPHAN SENGCHAREUN a/k/a “Kun,” and MICHAEL DEAN MILLER, together with other co-conspirators, both known and unknown to the Grand Jury, did unlawfully and knowingly combine, conspire, confederate, and agree with each other to distribute five grams or more of actual methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

All of which is in violation of Title 21, United States Code, Sections 846, 841(a)(1), and (b)(1)(B).

COUNT 2:

DISTRIBUTION OF A CONTROLLED SUBSTANCE

On or about June 24, 2011, within the District of Alaska, the defendant, BOAPHAN SENGCHAREUN a/k/a “Kun,” did knowingly and intentionally distribute a controlled substance, to wit, five grams or more of actual methamphetamine.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 3:

DISTRIBUTION OF A CONTROLLED SUBSTANCE

On or about June 29, 2011, within the District of Alaska, the defendant, BOAPHAN SENGCHAREUN a/k/a “Kun,” did knowingly and

intentionally distribute controlled substances, to wit, a mixture and substance containing a detectable amount of methamphetamine.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 4:

DISTRIBUTION OF A CONTROLLED SUBSTANCE

On or about July 6, 2011, within the District of Alaska, the defendant, BOAPHAN SENGCHAREUN a/k/a “Kun,” did knowingly and intentionally distribute controlled substances, to wit, a mixture and substance containing a detectable amount of methamphetamine.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 5:

DISTRIBUTION OF CONTROLLED SUBSTANCES

On or about April 27, 2012, within the District of Alaska, the defendant, JASON GERALD WOODS, did knowingly and intentionally distribute controlled substances, to wit:

- a. A mixture and substance containing a detectable amount of heroin;
- and

b. A mixture and substance containing a detectable amount of methamphetamine.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 6:

DISTRIBUTION OF A CONTROLLED SUBSTANCE

On or about May 10, 2012, within the District of Alaska, the defendant, JASON GERALD WOODS, did knowingly and intentionally distribute a controlled substance, to wit, five or more grams of actual methamphetamine.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 7:

DISTRIBUTION OF A CONTROLLED SUBSTANCE

On or about May 31, 2012, within the District of Alaska, the defendant, JASON GERALD WOODS, did knowingly and intentionally distribute a controlled substance, to wit, five or more grams of actual methamphetamine.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

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COUNT 8:

DISTRIBUTION OF A CONTROLLED SUBSTANCE

On or about June 28, 2012, within the District of Alaska, the defendants, JASON GERALD WOODS and BOAPHAN SENGCHAREUN a/k/a “Kun,” did knowingly and intentionally distribute a controlled substance, to wit, five or more grams of actual methamphetamine.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 9:

DISTRIBUTION OF A CONTROLLED SUBSTANCE

On or about July 5, 2012, within the District of Alaska, the defendants, JASON GERALD WOODS and MICHAEL DEAN MILLER, did knowingly and intentionally distribute a controlled substance, to wit, five or more grams of actual methamphetamine.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 10:

DISTRIBUTION OF A CONTROLLED SUBSTANCE

On or about August 23, 2012, within the District of Alaska, the defendant, JASON GERALD WOODS, did knowingly and intentionally

distribute a controlled substance, to wit, five or more grams of actual methamphetamine.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 11:

DISTRIBUTION OF A CONTROLLED SUBSTANCE

On or about September 6, 2012, within the District of Alaska, the defendant, JASON GERALD WOODS, did knowingly and intentionally distribute a controlled substance, to wit, five or more grams of actual methamphetamine.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 12:

POSSESSION WITH THE INTENT TO DISTRIBUTE A
CONTROLLED SUBSTANCE

On or about October 3, 2012, within the District of Alaska, the defendant, JASON GERALD WOODS, did knowingly and intentionally possess with the intent to distribute a controlled substance, to wit, five or more grams of actual methamphetamine.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 13:

DISTRIBUTION OF A CONTROLLED SUBSTANCE

On or about October 25, 2012, within the District of Alaska, the defendant, MICHAEL DEAN MILLER, did knowingly and intentionally distribute a controlled substance, to wit, five or more grams of actual methamphetamine.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 14:

USING OR CARRYING A FIREARM DURING AND IN RELATION
TO THE COMMISSION OF A DRUG TRAFFICKING CRIME

On or about August 23, 2012, within the District of Alaska, the defendant, JASON GERALD WOODS, did, during and in relation to a drug trafficking crime as charged in Count 10 of this Indictment, knowingly use and carry a firearm, to wit, a Kel-Tec, 9mm pistol.

All of which is in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

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COUNT 15:

USING OR CARRYING A FIREARM DURING AND IN RELATION
TO THE COMMISSION OF A DRUG TRAFFICKING CRIME

On or about October 3, 2012, within the District of Alaska, the defendant, JASON GERALD WOODS, did, during and in relation to a drug trafficking crime as charged in Counts 1 and 12 of this Indictment, knowingly use and carry a firearm, to wit, a Kel-Tec 9mm pistol.

All of which is in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 16:

FELON IN POSSESSION OF A FIREARM

On or about October 3, 2012, within the District of Alaska, the defendant, JASON GERALD WOODS, having been convicted of Third Degree Misconduct Involving a Controlled Substance on November 20, 2006, in the Superior Court of the State of Alaska, Third Judicial District, case number 3AN-S06-10898, a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, the following firearm, to wit, one Kel-Tec, Model: P-11, Caliber 9mm Luger bearing serial number AWB51.

All of which is in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

CRIMINAL FORFEITURE ALLEGATION:

Upon conviction of Count 1, 10, and 12 of this Indictment, defendant JASON GERALD WOODS shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a)(1) and (a)(2), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s) and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s). The property to be forfeited includes, but is not limited to, the following:

- One Kel-Tec, Model: P-11, Caliber 9mm Luger bearing serial number AWB51

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All of which is in accordance with 21 U.S.C. § 853(a)(1) and (a)(2) and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

s/Stephanie C. Courter
STEPHANIE C. COURTER
United States of America
Assistant U.S. Attorney

s/Karen L. Loeffler
KAREN L. LOEFFLER
United States of America
United States Attorney

DATE: February 19, 2013